

EXHIBIT D



SCHIFFRIN BARROWAY
TOPAZ & KESSLER, LLP
Attorneys at Law

280 King of Prussia Road • Radnor, Pennsylvania 19087
(610) 667-7706 • Fax: (610) 667-7056
www.sbtclaw.com

E-Mail: rbiela@sbtclaw.com

May 19, 2008

VIA E-MAIL & FIRST CLASS MAIL

Elise M. Bloom, Esq.
PROSKAUER ROSE LLP
1585 Broadway
New York, New York 10036

Re: Eng-Hatcher v. Sprint Nextel Corporation, et al.
Case No. 2:07-cv-7350 (BSJ) (KNF) (S.D.N.Y.)

Dear Elise:

Please be advised that Plaintiff wishes to take the deposition of a Sprint Nextel Corporation (Sprint) designee (or designees) pursuant to Fed. R. Civ. P. 30(b)(6). The designee or designees can be one or more officers, directors, managing agents or other persons designated by Sprint who are the most qualified to testify on the Company's behalf with respect to the matters described in Plaintiff's Amended Complaint in the above matter.

Sprint shall designate one or more officers, directors, managing agents or other persons who are qualified to testify on the company's behalf. The general areas to be covered during the 30(b)(6) deposition include but are not limited to:

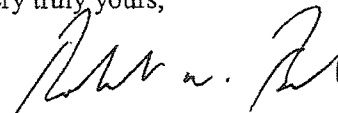
- 1) The Company's compensation policies, practices and procedures with regard to its Sales Representatives (as the term is defined in Plaintiff's Amended Complaint);
- 2) The job duties and responsibilities of Sales Representatives;
- 3) The duties and responsibilities of Sprint's Retail Store Managers, District Managers and Regional Managers concerning oversight and supervision of retail store budgets, labor management, allocation of labor hours, and review and/or adjustment of time records;

Elise M. Bloom, Esq.
May 19, 2008
Page 2 of 2

- 4) The compensation policies, practices and procedures for Sprint's Retail Store Managers, District Managers and Regional Managers;
- 5) The time-keeping policies, practices and procedures for Sprint's Sales Representatives including: how and when work hours are reported, confirming and verifying time records, overtime, recording time for meal and rest breaks, audits of time records, etc.;
- 6) The time keeping systems used by Sprint to record the hours worked by Sales Representatives including: the systems used, the job titles of those with access to the time-keeping systems, etc.;
- 7) The operation, management and supervision of Sprint's retail store locations.

Please provide us with convenient dates for the taking of this deposition. Thank you for your attention to the foregoing. I look forward to hearing from you at your earliest convenience.

Very truly yours,



Robert W. Biela

RWB/db

cc: Gerald D. Well, III, Esq.
Ashley R. Hurst, Esq.